



GARY M. RESTAINO  
United States Attorney  
District of Arizona  
STUART ZANDER  
California State Bar No. 276724  
MATTHEW D. DOYLE  
Arizona State Bar No. 036235  
Assistant U.S. Attorneys  
Two Renaissance Square  
40 N. Central Ave., Suite 1800  
Phoenix, Arizona 85004  
Telephone: 602-514-7500  
Email: Stuart.Zander@usdoj.gov  
Email: Matthew.Doyle@usdoj.gov  
Attorneys for Plaintiff

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
Plaintiff,

vs.

1. Armando Daniel Delgado,  
2. Jessie Jenaro Paz-Aguilar,  
3. Izaiah Alexander Jackson,  
4. Daneasha Danae Phillips,  
5. Miah Lynae Trevino,  
6. Norma Angelica Rodriguez,  
7. Kevin Jose Garcia Meza,  
8. William Eden Garcia Jr.,  
9. Luis Angel Cabral,  
10. Emiliano Acevedo, and  
11. Cid Carlos Hernandez Jr.,

Defendants.

No. CR-24-00210-PHX-MTL (ESW)

**INDICTMENT**

VIO: 8 U.S.C. §§ 1324(a)(1)(A)(v)(I),  
(a)(1)(A)(ii), (a)(1)(B)(i)  
(Conspiracy to Transport Illegal  
Aliens for Profit)  
Count 1

**THE GRAND JURY CHARGES:**

**BACKGROUND**

At times relevant to this Indictment:

1. Snapchat is a mobile instant messaging application developed by Snap Inc. (originally Snapchat Inc.), which provides users a way to share photos, videos, geo-locations, and chats.

1           2.       Snapchat is used for creating multimedia messages referred to as “Snaps.”  
2       “Snaps” are photos or videos that may be shared directly with other users, or in a “Story”  
3       or “Chat.” A “Story” is a collection of Snaps displayed in chronological order, while the  
4       “Chat” feature allows a user to type messages and send Snaps, audio notes, and video notes  
5       to other users within the Snapchat application. A post may be saved by the user and posted  
6       on a later date, which is referred to as a “Memory.”

7           3.       One of the principal features of Snapchat is that pictures and messages are  
8       usually only available for a short time (24 hours unless removed earlier by the user) before  
9       they become inaccessible to their recipients. Generally, absent changes to user settings,  
10      once the content is sent and opened by the recipient, the content will be deleted from the  
11      user’s device after a certain amount of time, unless the receiver opts to save the content.  
12      For instance, Snapchat users are able to save photos and videos to their device or to  
13      “Memories,” Snapchat’s cloud-storage service. A user can also save part of a Chat by  
14      tapping on the message they want to keep.

15          4.       Users can manage their privacy settings so that their Story can be viewed by  
16      all Snapchat users, their friends, or a custom audience. A user can also submit their Snaps  
17      to Snapchat’s “Our Story” service, which enables their Snaps to be viewed by all Snapchat  
18      users in Search and the general location of the user shown on the Snap Map.

19          5.       Human smuggling organizations operate to unlawfully smuggle individuals  
20      into the United States from other countries, including Mexico. These aliens being  
21      smuggled are not United States citizens and have not received the prior official  
22      authorization from the United States government to come to, enter, or reside in the United  
23      States. The aliens being smuggled, or their families, have typically paid or promised to  
24      pay money, or provide other things of value, in exchange for being smuggled into the  
25      United States.

26          6.       Human smuggling organizations commonly utilize coordinators to recruit  
27      persons to transport aliens unlawfully within the United States. The Snapchat application,  
28      in conjunction with other means, has been utilized by persons associated with such human

1 smuggling organizations to coordinate, carry out, and attempt to carry out, these activities.  
2 This includes users of Snapchat utilizing Story posts to recruit others to join in or carry out  
3 human smuggling activities, such as by recruiting persons to pick up and transport  
4 individuals who have been unlawfully smuggled into the United States and by identifying  
5 locations where such smuggled individuals should be picked up or dropped off within the  
6 United States.

7 **COUNT ONE**

8 7. The factual allegations in the preceding paragraphs are realleged and  
9 incorporated as though full set forth herein.

10 8. Beginning on an unknown date and continuing through on or about  
11 December 20, 2023, in the District of Arizona and elsewhere, defendants, ARMANDO  
12 DANIEL DELGADO, JESSIE JENARO PAZ-AGUILAR, IZAAH ALEXANDER  
13 JACKSON, DANEASHA DANAE PHILLIPS, MIAH LYNAE TREVINO, NORMA  
14 ANGELICA RODRIGUEZ, KEVIN JOSE GARCIA MEZA, WILLIAM EDEN GARCIA  
15 JR., LUIS ANGEL CABRAL, EMILIANO ACEVEDO and CID CARLOS  
16 HERNANDEZ JR., did knowingly and willfully combine, conspire, confederate, and agree  
17 with persons known and unknown to the grand jury to transport and move within the United  
18 States, and attempt to do the same, aliens who had come to, entered, and remained in the  
19 United States in violation of law, by means of transportation and otherwise, and in  
20 furtherance of such violation of law, for the purpose of commercial advantage and private  
21 financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

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1 All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and  
2 1324(a)(1)(B)(i).

3  
4 A TRUE BILL

5  
6 /s/  
FOREPERSON OF THE GRAND JURY  
Date: February 6, 2024  
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8 GARY M. RESTAINO  
United States Attorney  
9 District of Arizona  
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11 /s/  
STUART ZANDER  
12 MATTHEW D. DOYLE  
Assistant U.S. Attorneys  
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